UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS CENTRAL SECTION

DAVINCI BIOMEDICAL RESEARCH PRODUCTS, INC., Plaintiff

V.

TOSHIBA AMERICA MEDICAL SYSTEMS, INC.,

Defendant

Civil Action No. 04-CV-40027 (FDS)

JOINT MOTION FOR THE ENTRY OF STIPULATION AND CONSENT PROTECTIVE ORDER

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, plaintiff DaVinci
Biomedical Research Products, Inc. and defendant Toshiba America Medical Systems, Inc.
jointly move that the Court approve and enter as an Order of this Court the Stipulation and
Consent Protective Order which is being filed with this motion. In support of this motion, the
parties state that all parties, by their respective counsel, have signed the attached Stipulation and
Consent Protective Order and request that it be entered as an Order of this Court.

TOSHIBA AMERICA MEDICAL SYSTEMS, INC.

By its Attorneys,

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Dated: